

# EXHIBIT G

**Zisk, Ben**

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**From:** Andrew Stephens <andrew@hackerstephens.com>  
**Sent:** Tuesday, September 13, 2022 10:14 AM  
**To:** Zisk, Ben; Heather Hacker  
**Cc:** Godesky, Leah; Ashby, Danny S.; Chapa, Justin R.; Whisler, Megan; Craig.Margolis@arnoldporter.com; Lollar, Tirzah; Murad.Hussain@arnoldporter.com; Christopher.Odell@arnoldporter.com; Sheehan, Christian; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; Eugenia.Krieg@oag.texas.gov; Drew.Wright@oag.texas.gov; Sindy.Chandy@oag.texas.gov; Rhonda.Rodriguez@oag.texas.gov; Ana.Aranda@oag.texas.gov; Janice.Garrett@oag.texas.gov; Jennifer.Rowell@oag.texas.gov; Michael.Moore@oag.texas.gov; Martin, Meghan C.; Winter, Zachary; brown@blackburnbrownlaw.com; Carrie Killion; Bloom, Craig P.  
**Subject:** Re: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z -- PPFA's Production

[EXTERNAL MESSAGE]

As to the documents produced by PPFA on September 9, 2022, this email serves as our written objection and request under Paragraph 7 of the Protective Order that you change the designations of (1) all documents marked "Confidential" that do not contain "protected health information" as defined by Paragraph 2 of the Protective Order and (2) all documents marked "Attorney Eyes Only" that do not contain Personal Identification Information listed in examples 1-6 of Paragraph 2 of the Protective Order.

We are available to meet and confer on this issue pursuant to Paragraph 7 of the Protective Order.

Andrew

**Andrew B. Stephens**

Partner

Hacker Stephens LLP

[www.hackerstephens.com](http://www.hackerstephens.com)

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**From:** Zisk, Ben <bzisk@omm.com>  
**Sent:** Tuesday, September 13, 2022 12:30 PM  
**To:** Andrew Stephens <andrew@hackerstephens.com>; Heather Hacker <heather@hackerstephens.com>  
**Cc:** Godesky, Leah <lgodesky@omm.com>; Ashby, Danny S. <dashby@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Whisler, Megan <mwhisler@omm.com>; Craig.Margolis@arnoldporter.com <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Murad.Hussain@arnoldporter.com <Murad.Hussain@arnoldporter.com>; Christopher.Odell@arnoldporter.com <Christopher.Odell@arnoldporter.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Raymond.Winter@oag.texas.gov <Raymond.Winter@oag.texas.gov>; Amy.Hilton@oag.texas.gov <Amy.Hilton@oag.texas.gov>; Eugenia.Krieg@oag.texas.gov <Eugenia.Krieg@oag.texas.gov>;

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**Subject:** RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z -- PPFA's Production

Hi Andrew,

This production has a total of 74,845 documents, with 55,207 designated Attorneys Eyes Only and 9,133 designated Confidential.

Please let us know if you have any other questions or issues as you process these documents.

Best,

Ben Zisk  
O: +1-310-246-6714  
[bzisk@omm.com](mailto:bzisk@omm.com)

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**From:** Andrew Stephens <andrew@hackerstephens.com>

**Sent:** Monday, September 12, 2022 12:06 PM

**To:** Zisk, Ben <bzisk@omm.com>; Heather Hacker <heather@hackerstephens.com>

**Cc:** Godesky, Leah <lgodesky@omm.com>; Ashby, Danny S. <dashby@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Whisler, Megan <mwhisler@omm.com>; Craig.Margolis@arnoldporter.com; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Murad.Hussain@arnoldporter.com; Christopher.Odell@arnoldporter.com; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Raymond.Winter@oag.texas.gov; Amy.Hilton@oag.texas.gov; Eugenia.Krieg@oag.texas.gov; Drew.Wright@oag.texas.gov; Sinty.Chandy@oag.texas.gov; Rhonda.Rodriguez@oag.texas.gov; Ana.Aranda@oag.texas.gov; Janice.Garrett@oag.texas.gov; Jennifer.Rowell@oag.texas.gov; Michael.Moore@oag.texas.gov; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>; brown@blackburnbrownlaw.com; Carrie Killion <Carrie.Killion@oag.texas.gov>; Bloom, Craig P. <cbloom@omm.com>

**Subject:** RE: U.S. ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z -- PPFA's Production

[EXTERNAL MESSAGE]

Leah,

Thank you for the document production. We are still processing and uploading the documents but in the meantime could you please let us know how many documents are in this production and the number of documents that are designated (1) Attorneys Eyes Only and (2) Confidential ?

Thank you,

Andrew

**Andrew B. Stephens**  
Partner

**HACKERSTEPHENS**<sub>LLP</sub>  
[www.hackerstephens.com](http://www.hackerstephens.com)

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**From:** Zisk, Ben <[bzisk@omm.com](mailto:bzisk@omm.com)>

**Sent:** Friday, September 9, 2022 11:13 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Cc:** Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>; Chapa, Justin R.

<[jchapa@omm.com](mailto:jchapa@omm.com)>; Whisler, Megan <[mwhisler@omm.com](mailto:mwhisler@omm.com)>; [Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com); Lollar, Tirzah

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[Jennifer.Rowell@oag.texas.gov](mailto:Jennifer.Rowell@oag.texas.gov); [Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov); Martin, Meghan C.

<[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Winter, Zachary <[Zachary.Winter@arnoldporter.com](mailto:Zachary.Winter@arnoldporter.com)>;

[brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); Carrie Killion <[Carrie.Killion@oag.texas.gov](mailto:Carrie.Killion@oag.texas.gov)>; Bloom, Craig P. <[cbloom@omm.com](mailto:cbloom@omm.com)>

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Counsel,

Please see the attached letter. As explained in the letter, I will follow up momentarily with a link to the website where these documents can be found, along with log-in information.

Best,  
Ben

**O'Melveny**

**Ben Zisk**

[bzisk@omm.com](mailto:bzisk@omm.com)

O: +1-310-246-6714

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